

Exhibit 34

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, et al.,
individually and on behalf of a class of
all others similarly situated,

Plaintiffs,

vs.

1:18-cv-00719-CCR

CITY OF BUFFALO, N.Y., et al.,

Defendants.

ORAL EXAMINATION OF ADAM WIGDORSKI

APPEARING REMOTELY FROM

BUFFALO, NEW YORK

Wednesday, May 24, 2023

9:30 a.m. - 1:52 p.m.

pursuant to notice

REPORTED BY:

Luanne K. Howe

APPEARING REMOTELY FROM CUYAHOGA COUNTY, OHIO

DEPAOLO CROSBY REPORTING SERVICES, INC.
716-853-5544

1 That's why our legislators in the state made it an
2 illegal offense according to New York State Vehicle
3 and Traffic Law.

4 Q Do you recall receiving any instruction to issue
5 multiple tickets per window?

6 A No, ma'am.

7 MR. SAHASRABUDHE: Form. Go ahead.

8 A No, ma'am.

9 Q Did you receive any instruction about how many
10 tickets to issue per tinted window violation, so
11 whether to issue one ticket for a vehicle having
12 multiple windows or whether to issue multiple
13 tickets?

14 A No, ma'am.

15 Q Was there any discussion among Strike Force members
16 about issuing multiple tickets?

17 A No, ma'am.

18 Q Was issuing multiple tickets brought up by your
19 supervisors in any way?

20 A No, ma'am.

21 Q And you hardly issued any tinted window tickets to
22 white people, correct?

23 MR. SAHASRABUDHE: Form.

1 A I don't know the racial statistics on my ticket
2 issuance.

3 Q Right. We can go back to Exhibit 9, I believe, which
4 has the total numbers of tinted windows tickets you
5 issued broken down by race. And that document does
6 show that you tended to issue more tinted windows
7 tickets -- not issue tinted windows tickets to white
8 people; is that correct?

9 MR. SAHASRABUDHE: Objection to the form
10 of the question.

11 A Yes. Based on this chart, it shows -- which is also
12 presumed because of the area that I was patrolling.

13 Q Can you explain what you mean by that?

14 A The areas that I patrolled was predominantly like the
15 east side of Buffalo, which is predominantly an
16 African-American and Middle Eastern descent
17 neighborhood.

18 Q Okay. So we can move on. I would like to talk now
19 about traffic enforcement policies. And so as a
20 Strike Force officer, you mentioned that you had
21 duties outside of implementing checkpoints. So can
22 you just go over some of those duties?

23 A Yes. Proactive policing, again vehicle and traffic

1 STATE OF OHIO)

2 COUNTY OF CUYAHOGA)

3 I, Luanne K. Howe, Notary Public, in and for the
4 County of Cuyahoga, State of Ohio, do hereby certify:

5 That the witness whose testimony appears
6 hereinbefore was, before the commencement of her testimony,
7 duly sworn to testify the truth, the whole truth and nothing
8 but the truth; that said testimony was taken remotely
9 pursuant to notice at the time and place as herein set
10 forth; that said testimony was taken down by me and
11 thereafter transcribed into typewriting, and I hereby
12 certify the foregoing transcript is a full, true and correct
13 transcription of my shorthand notes so taken.

14 I further certify that I am neither counsel for
15 nor related to any party to said action, nor in any way
16 interested in the outcome thereof.

17 IN WITNESS WHEREOF, I have hereunto subscribed my
18 name and affixed my seal this 30th day of May, 2023.

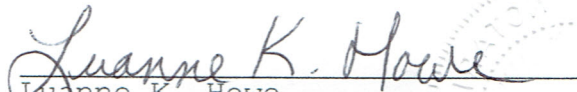
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Luanne K. Howe

Notary Public - State of Ohio

My commission expires 10-07-24